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FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

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AUG 22 11 20 AM '00

August 11, 2000

Mr. and Mrs. Clyde Scott, Jr.  
EME Communications  
293 JC Saunders Road  
Moultrie, Georgia 31768

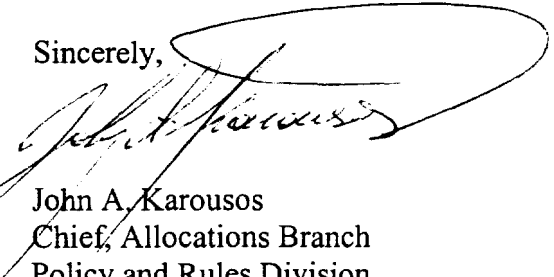
Dear Mr. and Mrs. Scott:

This is in response to the petition for rule making you filed requesting the allotment of Channel 291A at Lake City, Tennessee, as the community's first local aural transmission service.

Your request for the allotment of Channel 291A at Lake City is unacceptable. Our engineering analysis indicates that while the site which you specify in your proposal (36-06-54 NL and 84-16-10 WL) meets the minimum distance separation requirements, it would not enable a Class A facility to provide a 70 dBu signal to all of Lake City as required by Section 73.315 of the Commission's Rules. The 70 dBu contour for a Class A facility extends to 16.2 kilometers. The site you propose is 15.4 kilometers (9.5 miles) southwest of the community and would only provide city-grade coverage to approximately 80% of Lake City.

In view of the above, we are returning your petition for rule making.

Sincerely,



John A. Karousos  
Chief, Allocations Branch  
Policy and Rules Division  
Mass Media Bureau

Enclosures

**BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, DC 20554**

**MAY, 2000**

**RECEIVED**

) **MAY 23 2000**  
)

**FCC MAIL ROOM**  
)



In the matter of

Admendment of CFR section 73.202  
of the Commissions rules

**PETITION FOR RULEMAKING**

The following technical exhibit, and petition for Rulemaking, has been prepared for, and on behalf of, Clyde and Connie Lee Scott, D.B.A. EME Communications, 293 JC Saunders Road, Moultrie, Georgia 31768. The purpose is to request the assignment of channel 291A to Lake City, Tennessee as that cities first aural service.

Lake City is located in Anderson County Tennessee . Lake City is listed with the United States Census Department. As of 7/1/1998, The population of Anderson county, Tennessee was 71,116. The total population within the proposed 70 dBu contour is 121,363 persons. The total population within the 60 dBu contour is 455,872. This study clearly shows that the public interest would clearly be served by adding an additional service to 455,872 persons.

Exhibit -2 is the city data on Lake City, Tennessee as derived from the US Census bureau. The 1990 population of Lake City was 6,099 persons. Lake City is an incorporated city with an active city government including Police, Fire and Water services. Lake City has it's own hospital and several churches and businesses.

Exhibit-3 is a USGS Topographic map plot of the proposed 70 dBu Contour. This exhibit clearly shows that the proposed 70 dBu (3.16 mV/m) contour will completely encompass the city of Lake City, Tennessee.

WNGC, Licensed to Toccoa, Georgia was recently granted a license, to downgrade from a class C to C1 facility. With this downgrade, the clear area to locate channel 291A is created for Lake City, TN. Exhibit-1 is a spacing study with the WNGC 291C site deleted from this study. This exhibit clearly shows that this channel can be allotted to Lake City without any additional interference to existing or proposed facilities and is in full compliance with CFR section 73.202 of the Commissions rules.

### **Conclusion**

It is concluded that channel 291A can be assigned to Lake City, Tennessee in accordance with CFR section 73.207 of the Commissions rules, without any deleting or substitution within the present table of allotments, and therefore should be granted.

Once channel 291A is assigned to Lake City, Tennessee, Clyde and Connie Lee Scott, D.B.A. EME Communications, will file an application with the FCC, and once granted, will build and operate this facility within, and for, the people of Lake City, Anderson County, Tennessee.

Respectfully:

\_\_\_\_\_  
Clyde Scott, Jr.

\_\_\_\_\_  
Connie Lee Scott

EME Communications  
293 JC Saunders Road  
Moultrie, Georgia. 31768  
912-890-2506  
912-985-0864 (fax)

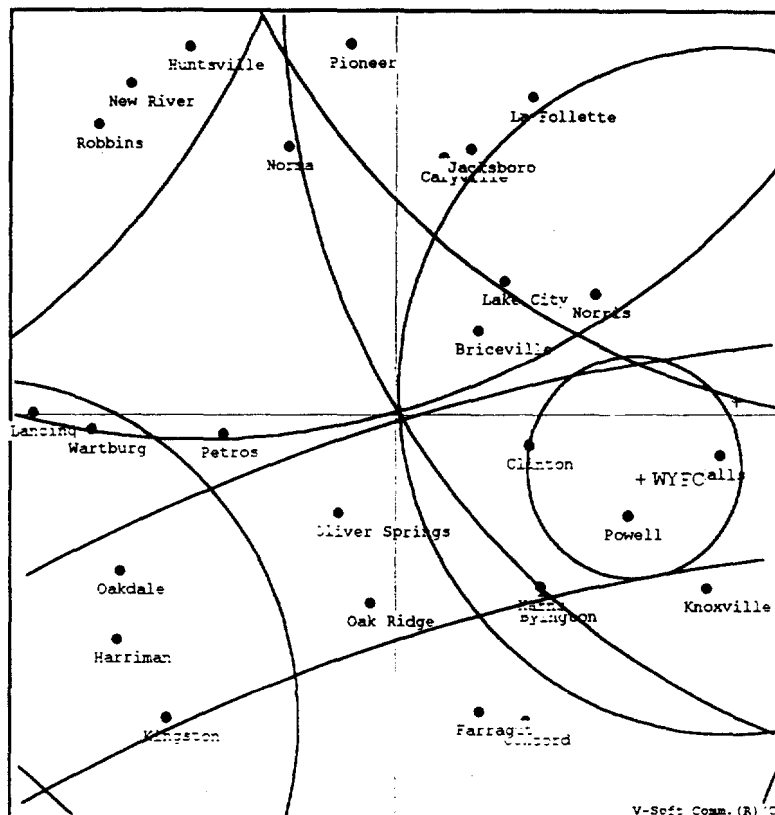
May, 2000

EXHIBIT - 1 SPACING STUDY  
LAKE CITY, TENNESSEE

SEARCHFM<sup>(TM)</sup> LOCATE STUDY

Ch 291 A  
106.1 MHz

N. Lat. 36 06 54  
W. Lng. 84 16 10



Call	CH#	Location		D-KM	Azi	FCC	Margin
WHAY	290A	Whitley City	KY	72.25	345.2	72.0	0.25
AVAC	290A	Tazewell	TN	72.35	57.9	72.0	0.35
WXVO.C	294A	Norris	TN	31.36	85.9	31.0	0.36
WNGC.C	291C1	Toccoa	GA	200.57	163.8	200.0	0.57
RADD	291C1	Sugar Hill	GA	200.57	163.8	200.0	0.57
RADD	291C1	Lawrenceville	GA	200.57	163.8	200.0	0.57
WYFC	237A	Clinton	TN	22.81	101.9	10.0	12.81
WRIL.C	292A	Pineville	KY	87.05	35.1	72.0	15.05
WRIL.C	292A	Pineville	KY	87.06	35.2	72.0	15.06
WOFEFM	289A	Rockwood	TN	48.81	235.4	31.0	17.81
WNGC.A	291C1	Toccoa	GA	219.49	164.5	200.0	19.49
WANYFM	292A	Albany	KY	102.12	309.7	72.0	30.12
WSKZ	293C	Chattanooga	TN	142.17	222.1	95.0	47.17
WDLY	288A	Gatlinburg	TN	78.22	125.6	31.0	47.22
WNRQ	290C	Nashville	TN	232.52	268.6	165.0	67.52
WRZK.C	290C3	Colonial Heigh	TN	157.82	72.6	89.0	68.82
WJDT	293A	Rogersville	TN	102.29	72.8	31.0	71.29

## EXHIBIT - 2

U.S. Census Bureau

### U.S. Gazetteer

Select one of the following matches to your query to look at that place in the Tiger Map Browser or retrieve 1990 Census tables.

This is a searchable index. Enter search keywords:

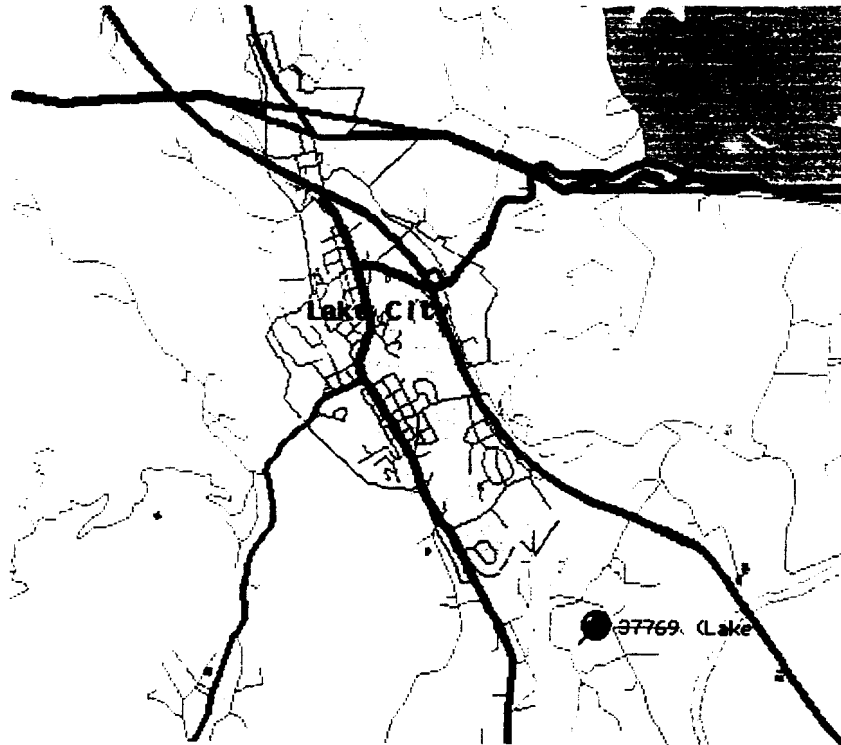
- **Zip Code:** 37769 **PO Name:** Lake City (TN)  
Population (1990): 6099  
Location: 36.203223 N, 84.138567 W  
Browse [Tiger Map](#) of area.  
Lookup 1990 Census zipcode data from [STF3B](#).

\*Note: This dataset is derived from the Census GIS and does not contain unincorporated place names.

For other geographic entities, try searching the [USGS Geographic Names Information System](#).

The [US Gazetteer Place and Zipcode files](#) used in this service is available for downloading.

For additional information, comments and suggestions, see the [Feedback](#) page.





LAKE CITY, TN. - TIRBU CONTOUR  
EXHIBIT-2

Center Latitude: 36-13-23.19  
Center Longitude: 83-13-13.41

NOTE: 1:50,000 Scale, 1:250,000 Scale, 1:500,000 Scale, 1:1,000,000 Scale

**DECLARATION AND QUALIFICATIONS OF PREPARER**

STATE OF GEORGIA )  
CITY OF MOULTRIE )  
COLQUITT COUNTY )

§

CLYDE SCOTT, JR. , UNDER PENALTY OF PERJURY, DECLARES AND SAYS  
HE IS A BROADCAST ENGINEER AND PRESIDENT OF EME COMMUNICATIONS.  
HE HAS BEEN ENGAGED TO PREPARE THE ATTACHED TECHNICAL EXHIBIT.

THAT HIS QUALIFICATIONS ARE A MATTER OF RECORD BEFORE THE FEDERAL  
COMMUNICATIONS COMMISSION AND HAS BEEN ACTIVE IN THE BROADCAST  
INDUSTRY SINCE 1965 AND IN BROADCAST ENGINEERING SINCE 1972. THAT  
HE IS THE HOLDER OF GENERAL RADIOTELEPHONE LICNESE NO. PG-6-30133.

THAT THE ATTACHED TECHNICAL EXHIBIT WAS EITHER PREPARED BY HIM  
OR UNDER HIS DIRECT SUPERVISION. ALL MATERIAL AND EXHIBITS HERETO  
ARE BELIEVED TO BE TRUE AND CORRECT.

**ORIGINAL SIGNED**

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CLYDE SCOTT, JR.